



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

DEVAL L. PATRICK
Governor

MAEVE VALLELY BARTLETT
Secretary

DAVID W. CASH
Commissioner

Ida McDonnell, CAP
USEPA Region 1
1 Congress Street – Suite 1100
Boston, Massachusetts 02114-2023

August 14, 2014

Re: **Administrative Amendment**
FINAL OPERATING PERMIT
Appl. #WE-14-018; Trans. # X259178

Dear Ms. McDonnell:

In accordance with 310 CMR 7.00 - APPENDIX C(8) of the Massachusetts Air Pollution Control Regulations (“the Regulations”), the Department of Environmental Protection (“MassDEP”) is forwarding to EPA the attached ***Administrative Amendment*** to the Final Operating Permit for Suddekor LLC located at 240 Bowles Road in Agawam, Massachusetts.

The attached Administrative Amendment to the Final Operating Permit consists of a change in the name of the facility contact, responsible official and Standard Industrial Classification code.

Should you have any questions concerning this ***Administrative Amendment*** to the Final Operating Permit, please contact Cortney Danneker at (413) 755-2234.

Sincerely,

This final document copy is being provided to you electronically by the
Department of Environmental Protection. A signed copy of this document
is on file at the DEP office listed on the letterhead.

Marc Simpson
Air Quality Permit Chief
Western Region

cc: Michael Szteliga
Suddekor LLC
240 Bowles Road
Agawam, MA 01001

ecc: Peter Czapienski, WERO
Yi Tian, MassDEP, Boston
Karen Regas, MassDEP, Boston

Dave Horowitz
Tighe & Bond
53 Southampton Road
Westfield, MA 01085



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AIR QUALITY OPERATING PERMIT

Issued by the Massachusetts Department of Environmental Protection ("Department" or "MassDEP") pursuant to its authority under M.G.L. c. 111, § 142B and § 142D, 310 CMR 7.00 et seq., and in accordance with the provisions of 310 CMR 7.00: Appendix C.

ISSUED TO ["the Permittee"]:

Ms. Lisa Verville
Suddekor, LLC
240 Bowles Road
Agawam, MA 01001

INFORMATION RELIED UPON:

Application No. WE-12-016
Transmittal No. X252330
Appl. WE-14-018; Trans. #X259178
(Admin. Amend: Change Facility Contact, Responsible Official and SIC code)

FACILITY LOCATION:

Suddekor, LLC
240 Bowles Road
Agawam, MA 01001

FACILITY IDENTIFYING NUMBERS:

AQ ID: 0420314
FMF FAC NO.: 329948
FMF RO NO.: 332095

NATURE OF BUSINESS:

Commercial Printing, Gravure
Hard Chromium Electroplating Process

Standard Industrial Classification (SIC): 2754, 3471

North American Industrial Classification System (NAICS): 323111, 332813

RESPONSIBLE OFFICIAL:

Name: Michael Szteliga
Title: Quality Assurance & EHS Manager

FACILITY CONTACT PERSON:

Name: Michael Szteliga
Title: Quality Assurance & EHS Manager
Phone: 413-821-9000
Email: MSzteliga@suddekorllc.com

This Operating Permit shall expire on 7/11/2018.

For the Department of Environmental Protection, Bureau of Waste Prevention

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

8/14/14

Michael Gorski
Regional Director
Department of Environmental Protection
Western Regional Office

Date

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-5751. TDD# 1-866-539-7622 or 1-617-574-6868

MassDEP Website: www.mass.gov/dep

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SPECIAL CONDITIONS FOR OPERATING PERMIT

1. PERMITTED ACTIVITIES

In accordance with the provisions of 310 CMR 7.00:Appendix C and applicable rules and regulations, the Permittee is authorized to operate air emission units as shown in Table 1 and exempt, and insignificant activities as described in 310 CMR 7.00:Appendix C(5)(h) and (i). The units described in Table 1 are subject to the terms and conditions shown in Sections 4, 5, and 6 and to other terms and conditions as specified in this Permit. Emissions from the exempt activities shall be included in the total facility emissions for the emission-based portion of the fee calculation described in 310 CMR 4.00 and this Permit.

A. DESCRIPTION OF FACILITY AND OPERATIONS

Suddekor, LLC is a rotogravure printer which produces decorative paper utilized in the manufacture of laminate flooring in the North American laminate industry. The facility commenced operation on April 17, 2000. The existing air contaminant sources at the facility consist of:

- A seven-foot wide Kochsiek production printing press with a 5.7 million Btu per hour natural gas-fired dryer
- A seven-foot wide Kochsiek production printing press with a 7.1 million Btu per hour natural gas-fired dryer
- A Giave lab development press with a 1.8 million Btu per hour natural gas-fired dryer
- A Giave lab development press with a 2.1 million Btu per hour natural gas-fired dryer
- A hard chromium electroplating process and associated centrifugal spray scrubber

There are no volatile organic compound (VOC) or hazardous air pollutant (HAP)-containing cleanup solvents used at this facility. Only water is used for cleanup purposes. Suddekor, LLC has restricted their annual facility-wide VOC and HAP emission rates to below major source thresholds.

The facility is currently not a major source since it does not have the potential to emit major quantities of any applicable air contaminant. Additionally, the facility established emission caps to limit the facility-wide emissions of VOCs, any combination of HAPs and any single HAP in Plan Approval WE-12-017, issued September 12, 2012. However, the United States Environmental Protection Agency (USEPA) had determined prior to the establishment of the facility-wide VOC and HAP emission limits contained in the September 2012 plan approval that the facility was a major source under the National Emission Standards for Hazardous Air Pollutants (NESHAPs) and the USEPA's "once in always in" policy. By being a major source under the NESHAPs, Suddekor, LLC is subject to the Operating Permit and Compliance Program pursuant to 310 CMR 7.00: Appendix C(2).

Production Printing Presses

The two Kochsiek rotogravure production printing presses coat paper using inks that contain VOCs and HAPs and are operating in accordance with Plan Approval #1-P-02-023, issued January 14, 2003 and

Plan Approval WE-12-017, issued September 12, 2012. The production printing presses are subject to 40 CFR Part 63; Subpart KK (National Emission Standards for the Printing and Publishing Industry). The associated dryers to each of the production presses are exempt from plan approval pursuant to 310 CMR 7.02(2)(b)15. However, any fuel burning equipment ≥ 3 million British thermal units per hour (MMBtu/hour) of heat input will be subject to the requirements of 310 CMR 7.04(4)(a) Inspection, Maintenance and Testing.

Lab Printing Presses

The two Giave rotogravure lab presses are exempt from plan approval pursuant to 310 CMR 7.02(2)(b)7. since Suddekor, LLC maintains records to demonstrate that the actual emissions of VOCs and HAPs are each less than 1 ton per year. As part of Plan Approval WE-12-017, issued September 12, 2012, Suddekor, LLC has limited each of the lab presses to less than 1 ton per year for VOCs and less than 1 ton per year for total HAPs. The lab presses are subject to 40 CFR Part 63; Subpart KK (National Emission Standards for the Printing and Publishing Industry). The associated dryers to each of the lab presses are exempt from plan approval pursuant to 310 CMR 7.02(2)(b)15. The lab presses share one exhaust stack.

Hard Chromium Electroplating Process

Suddekor conducts hard chromium electroplating of cylinders used on rotogravure printing lines. The hard chromium electroplating process was installed during March 2001 and is operating in accordance with Plan Approval #1-P-00-004, issued March 23, 2000. According to Plan Approval #1-P-00-004, the total chromium concentration from the electroplating process shall not exceed 0.015 milligrams per dry standard cubic meter. The chromium electroplating tank has a rectifier capacity of 8,000 ampere, and is vented first to a mist eliminator and then to a multi-stage composite mesh pad (CMP) with a final stage HEPA filter. The chromium electroplating operation is a small, hard chromium electroplating operation.

The existing chromium electroplating tank is considered by EPA to be located at a major source of HAPs and subject to the provisions for existing major sources contained in 40 CFR Part 63 Subpart N (National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks) in accordance with 40 CFR 63.343(a)(3). The existing chromium electroplating tank is subject to the requirements for existing major sources in 40 CFR Part 63 Subpart N since EPA determined that the facility was a major source of HAPs. After Subpart N was implemented, the facility established facility-wide HAP emission limits below major source thresholds in Plan Approval WE-12-017, issued September 12, 2012.

Pursuant to 40 CFR 63.340(c), process tanks associated with a chromium electroplating process, but in which chromium electroplating does not take place, are not subject to Subpart N. Therefore, only the chromium electroplating tank is subject to Subpart N.

Miscellaneous Combustion Units Less Than 3 MMBtu/hour

The facility has various natural gas-fired heating and process units each with a maximum heat input capacity of less than 3 MMBtu/hour which are identified on the facility's exempt activity list.

2. EMISSION UNIT IDENTIFICATION

The following emission units (Table 1) are subject to and regulated by this Operating Permit:

Table 1			
Emission Unit (EU#)	Description of Emission Unit	EU Design Capacity	Pollution Control Device (PCD)
1	Rotogravure Production Press Kochsiek / Natural Gas-Fired Drying Oven	350 meters/minute 5,650,352 Btu/hour	None
2	Rotogravure Production Press Kochsiek / Natural Gas-Fired Drying Oven	450 meters/minute 7,062,940 Btu/hour	None
3	Rotogravure Lab Press Giave Model: ZUM-4/600 S100//Natural Gas-Fired Drying Oven	120 meters/minute 1,765,735 Btu/hour	None
4	Rotogravure Lab Press Giave Model: ZUM-4/600 S100/ Natural Gas-Fired Drying Oven	120 meter/ minute 2,118,882 Btu/hour	None
5	Hard Chromium Electroplating Process	Rectifier Capacity = 8,000 amperes	Mist eliminator and multi-stage composite mesh pad with a final stage HEPA filter

Table 1 Footnote:

EU# = Emission Unit Number
PCD = Pollution Control Device
Btu = British Thermal Unit
HEPA = High-Efficiency Particulate Air

3. IDENTIFICATION OF EXEMPT ACTIVITIES

The following are considered exempt activities in accordance with the criteria contained in 310 CMR 7.00: Appendix C(5)(h):

Table 2	
Description of Current Exempt Activities	Reason
The list of current exempt activities is contained in the Operating Permit application and shall be updated by the Permittee to reflect changes at the facility over the Permit term. An up-to-date copy of exempt activities list shall be kept on-site at the facility and a copy shall be submitted to the MassDEP's Regional Office. Emissions from these activities shall be reported on the annual emissions statement pursuant to 310 CMR 7.12.	310 CMR 7.00:Appendix C(5)(h)

4. APPLICABLE REQUIREMENTS

A. OPERATIONAL AND/OR PRODUCTION EMISSION LIMITS AND RESTRICTIONS

The Permittee is subject to the limits/restrictions as contained in Table 3 below:

Table 3a					
EU #	Fuel/Raw Material/	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards ²	Applicable Regulation and/or Approval No
1	Paper/Inks	VOC	1. Coatings shall contain less than 0.5 pounds of VOC/gallon of solids as applied at all times	≤1.0 tons per month and ≤7.0 tons in any 12 consecutive month period	Plan Approval #1-P-02-023(1/14/03)
		Total HAP	2. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the coatings shall not exceed a HAP content of 1.04% by weight as applied.	≤1.0 tons per month and ≤3.94 tons in any 12 consecutive month period	Plan Approval #WE-12-017 (9/12/12)
	Natural Gas	Particulate matter	None	The drying oven shall not exceed 0.10 lb/MMBtu	Regulation 310 CMR 7.02(8)(h)
		Smoke	None	No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
		Opacity	None	≤ 20%, except 20 to ≤ 40% for ≤ 2 minutes during any one hour	Regulation 310 CMR 7.06(1)(b)
2	Paper/Inks	VOC	3. Coatings shall contain less than 0.5 pounds of VOC/gallon of solids as applied at all times	≤1.0 tons per month and ≤7.0 tons in any 12 consecutive month period	Plan Approval #1-P-02-023(1/14/03)
		Total HAP	4. Pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the coatings shall not exceed a HAP content of 1.04% by weight as applied.	≤1.0 tons per month and ≤3.94 tons in any 12 consecutive month period	Plan Approval #WE-12-017 (9/12/12)

Table 3b

EU #	Fuel/Raw Material/	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards ²	Applicable Regulation and/or Approval No
2	Natural Gas	Particulate matter	None	The drying oven shall not exceed 0.10 lb/MMBtu	Regulation 310 CMR 7.02(8)(h)
		Smoke	None	No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
		Opacity	None	≤ 20%, except 20 to ≤ 40% for ≤ 2 minutes during any one hour	Regulation 310 CMR 7.06(1)(b)
3	Paper/Inks	VOC	None	< 1.0 ton in any 12 consecutive month period	WE-12-017 (9/12/12)
		Total HAP	None	< 1.0 ton in any 12 consecutive month period	
	Natural Gas	Smoke	None	No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
		Opacity	None	≤ 20%, except 20 to ≤ 40% for ≤ 2 minutes during any one hour	Regulation 310 CMR 7.06(1)(b)
4	Paper/Inks	VOC	None	< 1.0 ton in any 12 consecutive month period	WE-12-017 (9/12/12)
		Total HAP	None	< 1.0 ton in any 12 consecutive month period	
	Natural Gas	Smoke	None	No. 1 of the Chart no more than 6 minutes during any one hour, at no time to exceed No. 2 of the Chart	Regulation 310 CMR 7.06(1)(a)
		Opacity	None	≤ 20%, except 20 to ≤ 40% for ≤ 2 minutes during any one hour	Regulation 310 CMR 7.06(1)(b)

Table 3c

EU #	Fuel/Raw Material/	Pollutant	Operational and/or Production Limits	Emissions Limits/Standards ²	Applicable Regulation and/or Approval No
1 2 3 4	Paper/Inks	VOC/Total HAP	5. In accordance with 40 CFR 63.825(b), each product and packaging rotogravure or wide-web flexographic printing affected source shall limit organic HAP emissions to no more than 4 percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.		40 CFR 63.825(b)
5	Chromic Acid	Chromium	6. In accordance with 40 CFR 63.343(c)(1)(ii), the composite mesh-pad system shall be operated within ± 2 inches of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests	≤ 0.015 milligrams per dry standard cubic meter (6.6×10^{-6} gr/dscf)	1-P-00-004 (3/23/00) 40 CFR Part 63, Subpart N ³
Facility-wide		VOC	None	≤ 1.5 tons per month and ≤ 10 tons in any 12 consecutive month period	WE-12-017 (9/12/12)
		Total HAP	None	≤ 1.0 ton per month and ≤ 7.7 tons in any 12 consecutive month period	
		Greenhouse gas ¹	None	N/A	310 CMR 7.71 (state only)

VOC = Volatile Organic Compounds

HAP = Hazardous Air Pollutant

Opacity = exclusive of uncombined water vapor

lbs/MMBtu = pounds per Million British thermal units

gr/dscf – grains per dry standard cubic foot

\leq = less than or equal to

% = percent

Table 3 Foot Notes:

- (1) Greenhouse Gas means any chemical or physical substance that is emitted into the air and that the MassDEP may reasonably anticipate will cause or contribute to climate change including, but not limited to, CO₂, CH₄, N₂O, SF₆, hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs)
- (2) To calculate the amount of a consecutive 12 month period take the current calendar month amount and add it to the previous 11 calendar months total amount.
- (3) In accordance with 40 CFR 63.342(b)(1) and effective on September 19, 2014, the emission limitations in 40 CFR 63.342 apply during tank operation as defined in 40 CFR 63.341, and during periods of startup and shutdown as these are routine occurrences for affected sources subject to this subpart. In response to an action to enforce the standards set forth in this subpart, the owner or operator may assert a defense to a claim for civil penalties for violations of such standards that are caused by a malfunction, as defined in 40 CFR 63.2. Appropriate penalties may be assessed, however, if the owner or operator fails to meet the burden of proving all the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief. An affirmative defense shall be established in accordance with 40 CFR 63.342(b)(1)(i).

B. COMPLIANCE DEMONSTRATION

The Permittee is subject to the monitoring/testing, record keeping, and reporting requirements as contained in Tables 4, 5, and 6 below and 310 CMR 7.00 Appendix C (9) and (10) and applicable requirements contained in Table 3:

Table 4a	
EU#	Monitoring And Testing Requirements
1 2	<p>1. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall monitor on a calendar month basis for EU #1 and #2:</p> <ul style="list-style-type: none"> a. Identity, quantity, formulation and density of coatings used; b. Identity, quantity, formulation and density of any diluents(s) and clean-up solvents used; c. Solids content of any coating(s) used; d. Quantity of product processed; e. The HAP content, as applied, of the coatings used; f. The pounds of HAPs emitted by EU #1; and g. The pounds of HAPs emitted by EU #2.
1 2	<p>2. In accordance with 310 CMR 7.04(4)(a), inspect and maintain each unit with an individual heat input capacity of greater than or equal to 3 MMBtu/hr in accordance with the manufacturer's recommendations and tested for efficient operation once each calendar year.</p>
1 2 3 4	<p>3. In accordance with 40 CFR 63.825(b)(2), the Permittee shall demonstrate compliance with the emission standard in condition #5, Table 3c herein, by demonstrating that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied during the month contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis as determined in accordance with paragraphs (b)(2)(i)-(ii) of 40 CFR 63.825. The Permittee shall calculate the as-applied HAP content of materials which are reduced, thinned, or diluted prior to application, as follows:</p> <ul style="list-style-type: none"> a. Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied on an as-purchased basis in accordance with 40 CFR 63.827(b)(2). b. Calculate the monthly average as-applied organic HAP content, C_{ahi} of each ink, coating, varnish, adhesive, primer, and other solids-containing material using Equation 3 contained in 40 CFR Part 63 Subpart KK.
	<p>4. In accordance with 40 CFR 63.827(b)(2), the Permittee shall determine the organic HAP weight fraction of each ink, coating, varnish, adhesive, primer, solvent, and other material applied by following one of the procedures specified below:</p> <ul style="list-style-type: none"> a. The owner or operator may test the material in accordance with Method 311 of Appendix A of 40 CFR Part 63. The Method 311 determination may be performed by the owner or operator of the affected source, the supplier of the material, or an independent third party. The organic HAP content determined by Method 311 must be calculated according to the criteria and procedures in paragraphs 40 CFR 63.827(b)(2)(i)(A) through (C) of this section. b. The owner or operator may determine the weight fraction volatile matter of the material in accordance with 40 CFR 63.827(c)(2) and use this value for the weight fraction organic HAP for all compliance purposes. c. The owner or operator may use formulation data to determine the weight fraction organic HAP of a material. Formulation data may be provided to the owner or operator on a CPDS by the supplier of the material or an independent third party. Formulation data may be used provided that the weight fraction organic HAP is calculated according to the criteria and procedures in paragraphs 40 CFR 63.827(b)(2)(iii)(A) through (D) of this section. In the event of an inconsistency between the formulation data and the result of Method 311 of appendix A of this part, where the test result is higher, the Method 311 data will take precedence unless, after consultation, the owner or operator can demonstrate to the satisfaction of MassDEP that the formulation data are correct.

Table 4b

EU#	Monitoring And Testing Requirements
5	<p>5. In accordance with 40 CFR 63.342, Table 1, the Permittee shall comply with the following operation and maintenance practices for the composite mesh pad system with a final stage HEPA filter.</p> <ul style="list-style-type: none"> a. Once per quarter, visually inspect device to ensure there is proper drainage, no chronic acid buildup on the pads, and no evidence of chemical attack on the structural integrity of the device. b. Once per quarter, visually inspect back portion of the mesh pad closest to the fan to ensure there is no breakthrough of chromic acid mist. c. Once per quarter, visually inspect ductwork from tank to the control device to ensure there are no leaks. d. Perform washdown of the composite mesh-pads in accordance with manufacturer's recommendations. <p>6. In accordance with 40 CFR 63.343(c)(1)(ii), the Permittee shall monitor the pressure drop across the composite mesh-pad system once each day that the affected source is operating.</p> <p>7. In accordance with 40 CFR 63.343(c)(1)(iii), the Permittee may repeat the performance test and establish as a new site-specific operating parameter the pressure drop across the composite mesh-pad system according to the requirements in 40 CFR 63.343(c)(1)(i) or (ii). To establish a new site-specific operating parameter for pressure drop, the Permittee shall satisfy the following requirements.</p> <ul style="list-style-type: none"> a. Determine the outlet chromium concentration using the test methods and procedures in 40 CFR 63.344(c); b. Establish the site-specific operating parameter value using the procedures 40 CFR 63.344(d)(5); c. Satisfy the recordkeeping requirements in 40 CFR 63.346(b)(6) through(8); and d. Satisfy the reporting requirements in 40 CFR 63.347(d) and (f). <p>8. In accordance with 40 CFR 63.344, the Permittee shall comply with the applicable performance test requirements and test methods contained in this section.</p>
Facility-wide	<p>9. In accordance with 310 CMR 7.71(1) and Appendix C(9) establish and maintain data systems or record keeping practices (e.g. fuel use records, SF6 usage documentation, Continuous Emissions Monitoring System) for greenhouse gas emissions to ensure compliance with the reporting provisions of M.G.L. c. 21N, the Climate Protection and Green Economy Act, St. 2008, c. 298, § 6. (State only requirement)</p> <p>10. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall monitor on a calendar month basis, the total pounds of VOC and HAP emitted from the entire facility.</p> <p>11. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall monitor all operations to ensure sufficient information is available to comply with 310 CMR 7.12 Source Registration.</p> <p>12. In accordance with 310 CMR 7.13 Stack Testing, conduct stack testing, upon written request of the MassDEP, for any air contaminant for which the MassDEP has determined testing is necessary, to ascertain compliance with the MassDEP's regulations or design approval provisos. All such testing shall be conducted in accordance with 310 CMR 7.13 (1) and (2), and in accordance with the applicable procedures specified in 40 CFR 60 Appendix A or other method if approved by the MassDEP and EPA.</p> <p>In accordance with 310 CMR 7.00 Appendix C(9)(b), any compliance determination with the allowable smoke/opacity emission limit shall be in accordance with EPA Method 9, as specified in 40 CFR 60, Appendix A or shall be made using a continuous opacity monitor installed and operated in accordance with 40 CFR Appendix B.</p>

Table 4 Notes:

EU# = Emission Unit Number

VOC = Volatile Organic Compound

HAP = Hazardous Air Pollutant

CPDS = Certified Product Data Sheet

MMBtu/hr = million British thermal unit per hour

CFR = Code of Federal Regulations

Table 5a

EU#	Record Keeping Requirements
1 2	<p>1. In accordance with DEP Approval 1-P-02-023 (1/14/03) and DEP Approval WE-12-017 (9/12/12), the Permittee shall maintain daily records which shall include, but are not limited to:</p> <ul style="list-style-type: none"> a. Identity, quantity, formulation and density of coatings used; b. Identity, quantity, formulation and density of any diluents(s) and clean-up solvents used; c. Solids content of any coating(s) used; d. Quantity of product processed; and e. The HAP content of the coatings used as applied. <p>2. In accordance with DEP Approval 1-P-02-023 (1/14/03), the Permittee shall generate monthly reports in-house that document compliance with the VOC emission limits for EU #1 and EU #2.</p> <p>3. In accordance with DEP Approval 1-P-02-023 (1/14/03), all records shall be kept on site for a minimum of five (5) years from date of record and shall be made available to the MassDEP upon request.</p> <p>4. In accordance with 310 CMR 7.04(4)(a), maintain comprehensive and accurate records of the annual inspection, maintenance and testing and the date upon which it was performed. These said records shall be posted conspicuously on or near each unit.</p>
1	<p>5. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall maintain comprehensive and accurate records on a calendar month basis and for each consecutive twelve month period (current month plus prior eleven months) of the total pounds of HAPs emitted from EU #1.</p>
2	<p>6. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall maintain comprehensive and accurate records on a calendar month basis and for each consecutive twelve month period (current month plus prior eleven months) of the total pounds of HAPs emitted from EU #2.</p>
3	<p>7. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall maintain comprehensive and accurate records on a calendar month basis and for each consecutive twelve month period (current month plus prior eleven months) of the total pounds of VOC and HAP emitted from EU #3.</p>
4	<p>8. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall maintain comprehensive and accurate records on a calendar month basis and for each consecutive twelve month period (current month plus prior eleven months) of the total pounds of VOC and HAP emitted from EU #4.</p>
1 2 3 4	<p>9. In accordance with 40 CFR 63.829(b), the Permittee shall maintain the following records on a monthly basis in accordance with the requirements of 40 CFR 63.10(b)(1) :</p> <ul style="list-style-type: none"> a. Records specified in 40 CFR 63.10(b)(2), of all measurements needed to demonstrate compliance with this standard, such as, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report. <p>10. In accordance with 40 CFR 63.829(f), the owner or operator choosing to exclude from an affected source, a product and packaging rotogravure or wide-web flexographic press which meets the limits and criteria of 40 CFR 63.821(a)(2)(ii)(A) shall maintain the records specified in paragraphs (f)(1) and (f)(2) of this section for five years and submit them to the Administrator upon request:</p> <ul style="list-style-type: none"> a. The total mass of each material applied each month on the press, including all inboard and outboard stations, and b. The total mass of each material applied each month on the press by product and packaging rotogravure or wide-web flexographic printing operations.
5	<p>11. In accordance with 40 CFR 63.342(f)(3)(iv), if actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by 40 CFR 63.342(f)(3)(i), the Permittee shall record the actions taken for that event.</p> <p>12. In accordance with 40 CFR 63.343(c)(1)(ii), the Permittee shall record the pressure drop across the composite mesh-pad system once each day that the affected source is operating.</p>

Table 5b

EU#	Record Keeping Requirements
5	<p>13. In accordance with 40 CFR 63.342(f)(3)(v), the Permittee shall keep the written operation and maintenance plan on record after it is developed to be made available for inspection, upon request, by the USEPA and MassDEP for the life of the affected source or until the source is no longer subject to the provisions of 40 CFR Part 63 Subpart N. In addition, if the operation and maintenance plan is revised, the owner or operator shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the USEPA and MassDEP for a period of 5 years after each revision to the plan.</p> <p>14. In accordance with 40 CFR 63.346(b)(1) through (12), (15),(16) and 63.346 (c), the Permittee shall maintain the following records:</p> <ul style="list-style-type: none"> a. Inspection records for the add-on air pollution control device, if such a device is used, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of 40 CFR 63.342(f) and Table 1 of 40 CFR 63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection. b. Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment; c. Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment; d. Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan; e. Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by 40 CFR 63.342(f)(3); f. Test reports documenting results of all performance tests; g. All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures of 40 CFR 63.344(e); h. Records of monitoring data required by 40 CFR 63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected; i The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment; j.The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment; k. The total process operating time of the affected source during the reporting period; l. Records of the actual cumulative rectifier capacity of hard chromium electroplating tanks at a facility expended during each month of the reporting period, and the total capacity expended to date for a reporting period, if the owner or operator is using the actual cumulative rectifier capacity to determine facility size in accordance with 40 CFR 63.342(c)(2); m. Any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements, if the source has been granted a waiver under 40 CFR 63.10(f); n. All documentation supporting the notifications and reports required by 40 CFR 63.9, 63.10, and 63.347. o. All records shall be maintained for a period of 5 years in accordance with 40 CFR 63.10(b)(1).

Table 5c	
EU#	Record Keeping Requirements
Facility-wide	15. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall maintain comprehensive and accurate records on a calendar month basis and for each consecutive twelve month period (current month plus prior eleven months) of the total pounds of VOC and HAP emitted from the entire facility.
	16. In accordance with DEP Approval WE-12-017 (9/12/12), the actual emissions of air contaminant(s) recorded for each calendar month and for each consecutive twelve month period (current month plus prior eleven months) shall be compiled no later than the 15 th day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at http://www.mass.gov/dep/air/approvals/aqforms.htm#report .
	17. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall maintain a copy of Plan Approval WE-12-017 (9/12/12), underlying Application and the most up-to-date SOMP for the EU(s) approved therein on-site.
	18. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall maintain a record of routine maintenance activities performed on the approved EU(s), PCD(s) and monitoring equipment. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	19. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on the approved EU(s) and monitoring equipment. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates and monitoring equipment returned to compliant operation.
	20. In accordance with 310 CMR 7.00 Appendix C(10)(b), maintain records of all monitoring data and supporting information, including all stack test results and all ambient air quality modeling results, on-site for a period of at least five years from the date of the monitoring sample, measurement, report or initial operating permit application.
	21. In accordance with 310 CMR 7.12(3)(b), maintain copies of Source Registration and other information supplied to the MassDEP to comply with 310 CMR 7.12, which shall be retained by the facility owner or operator for five years from the date of submittal.
	22. In accordance with 310 CMR 7.71 (6) b. and c. retain at the facility for five years and make available to the MassDEP upon request copies of the documentation of the methodology and data used to quantify greenhouse gas emissions. (State only requirement)

Table 5 Notes:

EU# = Emission Unit Number
HAP = Hazardous Air Pollutant
PCD = Pollution Control Device
SOMP = Standard Operating and Maintenance Procedure
USEPA = United States Environmental Protection Agency

Table 6a

EU#	Reporting Requirements
1 2	<p>1. In accordance with DEP Approval 1-P-02-023 (1/14/03), the Regional Bureau of Waste Prevention office must be notified by telephone or fax as soon as possible after the occurrence, but no later than 1 business day after the occurrence, of any upsets or malfunctions to the facility equipment, air pollution control equipment, or monitoring equipment which result in an excess emission to the air and a condition of air pollution.</p> <p>2. In accordance with DEP Approval 1-P-02-023 (1/14/03), the Permittee shall report within fifteen (15) days after the end of a calendar month if any emission limits are exceeded</p>
1 2 3 4	<p>3. In accordance with 40 CFR 63.830(b)(6), the Permittee shall submit a summary report specified in 40 CFR 63.10(e)(3) of this part on a semi-annual basis (i.e., once every 6-month period). These summary reports are required even if the affected source does not have any control devices or does not take the performance of any control devices into account in demonstrating compliance with the emission limitations in 40 CFR 63.824 or 63.825. The summary report shall include, as applicable:</p> <ul style="list-style-type: none"> a. Exceedances of the standards in 40 CFR 63.824–63.825. b. Exceedances of the criterion of 40 CFR 63.821(a)(2)(ii)(A). c. The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with 40 CFR 63.823(b), including actions taken to correct a malfunction. <p>All summary reports shall be delivered or postmarked by the 30th day following the end of each calendar half.</p> <p>4. In accordance with 40 CFR 63.830(c)(2), all reports required by this subpart not subject to the requirements in paragraph (c)(1) of this section must be sent to MassDEP and the USEPA at the appropriate address listed in 40 CFR 63.13. If acceptable to both the Administrator and the owner or operator of a source, these reports may be submitted on electronic media. The USEPA and MassDEP retain the right to require submittal of reports subject to paragraph (c)(1) of this section in paper format.</p>
5	<p>5. In accordance with 40 CFR 63.342(b)(1)(ii), the Permittee seeking to assert an affirmative defense shall submit a written report to MassDEP and the USEPA with all necessary supporting documentation, that it has met the requirements set forth in 40 CFR 63.342(b)(1)(i). This affirmative defense report shall be included in the first periodic compliance, deviation report or excess emission report otherwise required after the initial occurrence of the violation of the relevant standard (which may be the end of any applicable averaging period). If such compliance, deviation report or excess emission report is due less than 45 days after the initial occurrence of the violation, the affirmation defense report may be included in the second compliance, deviation report or excess emission report due after the initial occurrence of the violation of the relevant standard.</p> <p>6. In accordance with 40 CFR 63.342(f)(3)(iv), if actions taken by the Permittee during periods of malfunction are inconsistent with the procedures specified in the operation and maintenance plan required by 40 CFR 63.342(f)(3)(i), the Permittee shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. The report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the USEPA and MassDEP.</p> <p>7. In accordance with 40 CFR 63.347(d), the Permittee shall notify the USEPA and MassDEP of the intention to conduct a performance test at least 60 calendar days before the test is scheduled to begin.</p>

Table 6b

EU#	Reporting Requirements
5	<p data-bbox="304 546 1380 607">8. In accordance with 40 CFR 63.347(f)(2), reports of performance test results shall be submitted to the MassDEP no later than 90 days following the completion of the performance test.</p> <p data-bbox="304 658 1457 1211">9. In accordance with 40 CFR 63.347(f)(3)(i), within 60 days after the date of completing each performance test (defined in § 63.2) as required by this 40 CFR Part 63 Subpart N, the Permittee must submit the results of the performance tests, including any associated fuel analyses, required by this subpart to the EPA's WebFIRE database by using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through the EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). Performance test data must be submitted in the file format generated through use of the EPA's Electronic Reporting Tool (ERT) (see http://www.epa.gov/ttn/chief/ert/index.html). Only data collected using test methods on the ERT Web site are subject to this requirement for submitting reports electronically to WebFIRE. Owners or operators who claim that some of the information being submitted for performance tests is confidential business information (CBI) must submit a complete ERT file including information claimed to be CBI on a compact disk, flash drive or other commonly used electronic storage media to the EPA. The electronic media must be clearly marked as CBI and mailed to U.S. EPA/OAPQS/CORE CBI Office, Attention: WebFIRE Administrator, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same ERT file with the CBI omitted must be submitted to the EPA via CDX as described earlier in this paragraph. At the discretion of the delegated authority, you must also submit these reports, including the confidential business information, to the delegated authority in the format specified by the delegated authority. For any performance test conducted using test methods that are not listed on the ERT Web site, the owner or operator shall submit the results of the performance test to the Administrator at the appropriate address listed in § 63.13.</p> <p data-bbox="304 1263 1428 1323">10. In accordance with 40 CFR 63.347(g)(1), the Permittee shall submit a summary report semiannually to the USEPA and MassDEP to document the ongoing compliance status of the source except when:</p> <p data-bbox="339 1361 1428 1422">a. The USEPA or MassDEP determines on a case-by-case that more frequent reporting is necessary to accurately assess the compliance status of the source; or</p> <p data-bbox="339 1460 1428 1610">b. The monitoring data collected by the owner or operator of the affected source in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once the permittee reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency in accordance with 40 CFR 63.347(g)(2) is approved.</p> <p data-bbox="339 1648 1428 1697">All summary reports shall be delivered or postmarked by the 30th day following the end of each calendar half.</p>

Table 6c

EU#	Reporting Requirements
5	<p>11. In accordance with 40 CFR63.347(g)(3), the summary report shall contain the following information:</p> <ul style="list-style-type: none"> a. The company name and address; b. An identification of the operating parameter that is monitored for compliance determination, as required by 40 CFR 63.343(c); c. The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by 40 CFR 63.347(e);. d. The beginning and ending dates of the reporting period; e. A description of the type of process performed in the affected source; f. The total operating time of the affected source during the reporting period; g. A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes; h. A certification by a responsible official, as defined in 40 CFR 63.2, that the work practice standards in §63.342(f) were followed in accordance with the operation and maintenance plan for the source; i. If the operation and maintenance plan required by 40 CFR 63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by §63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed; j. A description of any changes in monitoring, processes, or controls since the last reporting period; k. The name, title, and signature of the responsible official who is certifying the accuracy of the report; and l. The date of the report.
Facility-wide	12. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30-days from MassDEP's request.
	13. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for emission testing as defined in Table 4 Monitoring and Testing Requirements.
	14. In accordance with DEP Approval WE-12-017 (9/12/12), the Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for emission testing as defined in Table 4 Monitoring and Testing Requirements.
	15. Submit a Source Registration/Emission Statement Form to MassDEP on an annual basis as required by 310 CMR 7.12.

Table 6d	
EU#	Reporting Requirements
Facility-wide	16. In accordance with 310 CMR 7.13(1) and 7.13(2), if determined by MassDEP that stack testing is necessary to ascertain compliance with the MassDEP's regulations or design approval provisos shall cause such stack testing to be summarized and submitted to the MassDEP as prescribed in the agreed to pretest protocol.
	17. In accordance with 310 CMR 7.00: Appendix C(10)(c). the Permittee shall report a summary of all monitoring data and related supporting information to MassDEP at least every six months (January 30 and July 30 of each calendar year).
	18. Submit Annual Compliance report to MassDEP and EPA by January 30 of each year and as required by General Condition 10 of this Permit.
	19. In accordance with 310 CMR 7.71(5), by April 15 th , 2010 and April 15 th of each year thereafter report emissions of greenhouse gases from stationary emissions sources including, but not limited to, emissions from factory stacks, manufacturing processes and vents, fugitive emissions, and other process emissions; and owned or leased motor vehicles when stationary source greenhouse gas emissions are greater than 5,000 short tons CO ₂ e. Report greenhouse gas emissions electronically in a format that can be accommodated by the registry. (State only requirement)
	20. In accordance with 310 CMR 7.71(6), certify greenhouse gas emissions reports using a form provided by MassDEP or the registry. (State only requirement)
	21. In accordance with 310 CMR 7.71(7), by December 31 st of the applicable year submit to MassDEP documentation of triennial verification of the greenhouse gas emissions report. (State only requirement)

Table 6 Notes:

EU # = Emission Unit

USEPA = The United States Environmental Protection Agency

MassDEP = Massachusetts Department of Environmental Protection

CFR = Code of Federal Regulations

C. GENERAL APPLICABLE REQUIREMENTS

The Permittee shall comply with all generally applicable requirements contained in 310 CMR 7.00 et seq. and 310 CMR 8.00 et. seq., when subject.

D. REQUIREMENTS NOT CURRENTLY APPLICABLE

The Permittee is currently not subject to the following requirements:

Table 7	
Regulation	Reason
310 CMR 7.16: Reduction of Single Occupant Commuter Vehicle Use	Facility employs fewer than 250 people.
40 CFR Part 64 -Compliance Assurance Monitoring	Facility is exempt since it does not meet the applicability criteria specified in 40 CFR 64.10(a)(1) through (3).

5. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to and shall comply with the following special terms and conditions that are not contained in Table 3, 4, 5, and 6:

Table 8a	
Special Terms and Conditions	
1 2 3 4	1. EU #1, EU #2, EU #3 and EU #4 are subject to the National Emission Standards for the Printing and Publishing Industry, 40 CFR Part 63.820 through 63.831 and shall comply with all applicable requirements.
5	2. EU #5 is subject to the National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks, 40 CFR Part 63.340 through 63.348 and shall comply with all applicable requirements.
	3. In accordance with 40 CFR 63.342(a)(1), at all times, the Permittee must operate and maintain any affected source subject to 40 CFR Part 63 Subpart N, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the Permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the USEPA and MassDEP which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.
	4. In accordance with 40 CFR 63.342(f)(1)(i) through (iii), <ul style="list-style-type: none"> a. At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices. b. Malfunctions shall be corrected as soon as practicable after their occurrence. c. Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.
	5. In accordance with 40 CFR 63.342(f)(3)(i), the Permittee shall prepare, an operation and maintenance plan. The plan shall include the elements specified in 40 CFR 63.342(f)(3)(i)(A) through (F).
	6. In accordance with 40 CFR 63.342(f)(3)(ii), if the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the Permittee shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events.
	7. In accordance with 40 CFR 63.343(a)(8), after March 19, 2013, the Permittee of an affected source that is subject to the standards in paragraphs 40 CFR 63.342(c) or (d) shall implement the housekeeping procedures specified in Table 2 of 40 CFR 63.342.
	8. In accordance with 40 CFR 63.343(c)(1)(iv), the requirement to operate a composite mesh-pad system within the range of pressure drop values established under 40 CFR 63.343(c)(1)(i) through (iii) does not apply during automatic washdown cycles of the composite mesh-pad system.

Table 8b	
Special Terms and Conditions	
1 2 3 4 5	9. EU #1, #2, #3 and #4 are subject to the requirements of 40 CFR 63.1-10,12-15, Subpart A, "General Provisions" [as indicated in Table "I" to Subpart KK of 40 CFR 63]. EU #5 is subject to the requirements of 40 CFR 63.1-10,12-15, Subpart A, "General Provisions" [as indicated in Table "1" to Subpart N of 40 CFR 63].
Facility-wide	10. In accordance with DEP Approval WE-12-017 (9/12/12) and pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the Permittee shall only use cleanup solvents which do not contain VOCs or HAPs.
	11. In accordance with DEP Approval WE-12-017 (9/12/12) and pursuant to the best available control technology provision of 310 CMR 7.02(8)(a)2, the Permittee shall comply with the following work practices: a. Store all VOC and/or HAP-containing inks, coatings, process-related waste materials and VOC and/or HAP-containing materials in closed containers; b. ensure that mixing and storage containers used for VOC and/or HAP-containing inks, coatings, process-related waste materials, and VOC and/or HAP-containing materials are kept closed at all times except when depositing or removing these materials; c. minimize spills of VOC and/or HAP-containing inks, coatings, process-related waste materials, and VOC and/or HAP-containing materials; d. convey VOC and/or HAP-containing inks, coatings, process-related waste materials, and VOC and/or HAP-containing materials from one location to another in closed containers or pipes; e. store and dispose of all absorbent materials, such as cloth or paper, that are contaminated with VOC and/or HAP-containing inks, coatings, process-related waste materials, or VOC and/or HAP-containing materials in non-absorbent containers that shall be kept closed except when placing materials in or removing materials from the container.

Table 8 Notes:

EU# = Emission Unit Number
CFR = Code of Federal Regulations
BWP = Bureau of Waste Prevention
VOC = Volatile Organic Compound
HAP = Hazardous Air Pollutant

6. ALTERNATIVE OPERATING SCENARIOS

The Permittee did not request alternative operating scenarios in its Operating Permit application.

7. EMISSIONS TRADING

A. INTRA-FACILITY EMISSION TRADING

The Permittee did not request intra-facility emissions trading in its Operating Permit application.

B. INTER-FACILITY EMISSION TRADING

The Permittee did not request inter-facility emissions trading in its Operating Permit application.

8. COMPLIANCE SCHEDULE

The Permittee has indicated that the facility is in compliance and shall remain in compliance with the applicable requirements contained in Sections 4 and 5.

In addition, the Permittee shall comply with any applicable requirements that become effective during the Permit term.

GENERAL CONDITIONS FOR OPERATING PERMIT

9. FEES

The Permittee has paid the permit application processing fee and shall pay the annual compliance fee in accordance with the fee schedule pursuant to 310 CMR 4.00.

10. COMPLIANCE CERTIFICATION

All documents submitted to the MassDEP shall contain certification by the responsible official of truth, accuracy, and completeness. Such certification shall be in compliance with 310 CMR 7.01(2) and contain the following language:

"I certify that I have personally examined the foregoing and am familiar with the information contained in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment."

The "Operating Permit Reporting Kit" contains instructions and the Annual Compliance Report and Certification and the Semi-Annual Monitoring Summary Report and Certification. The "Operating Permit Reporting Kit" is available to the Permittee via the MassDEP's web site, <http://www.mass.gov/dep/air/approvals/aqforms.htm#op>.

A. Annual Compliance Report and Certification

The Responsible Official shall certify, annually for the calendar year, that the facility is in compliance with the requirements of this Operating Permit. The report shall be postmarked or delivered by January 30 to the MassDEP and to the Regional Administrator, U.S. Environmental Protection Agency - New England Region. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- 1) the terms and conditions of the Permit that are the basis of the certification;
- 2) the current compliance status and whether compliance was continuous or intermittent during the reporting period;
- 3) the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods; and
- 4) any additional information required by the MassDEP to determine the compliance status of the source.

B. Semi-Annual Monitoring Summary Report and Certification

The Responsible Official shall certify, semi-annually on the calendar year, that the facility is in compliance with the requirements of this Permit. The report shall be postmarked or delivered by January 30 and July 30 to the MassDEP. The report shall be submitted in compliance with the submission requirements below.

The compliance certification and report shall describe:

- 1) the terms and conditions of the Permit that are the basis of the certification;
- 2) the current compliance status during the reporting period;
- 3) the methods used for determining compliance, including a description of the monitoring, record keeping, and reporting requirements and test methods;
- 4) whether there were any deviations during the reporting period;
- 5) if there are any outstanding deviations at the time of reporting, and the Corrective Action Plan to remedy said deviation;
- 6) whether deviations in the reporting period were previously reported;
- 7) if there are any outstanding deviations at the time of reporting, the proposed date of return to compliance;
- 8) if the deviations in the reporting period have returned to compliance and date of such return to compliance; and
- 9) any additional information required by the MassDEP to determine the compliance status of the source.

11. NONCOMPLIANCE

Any noncompliance with a permit condition constitutes a violation of 310 CMR 7.00: Appendix C and the Clean Air Act, and is grounds for enforcement action, for Permit termination or revocation, or for denial of an Operating Permit renewal application by the MassDEP and/or EPA. Noncompliance may also be grounds for assessment of administrative or civil penalties under M.G.L. c.21A, §16 and 310 CMR 5.00; and civil penalties under M.G.L. c.111, §142A and 142B. This Permit does not relieve the Permittee from the obligation to comply with any other provisions of 310 CMR 7.00 or the Act, or to obtain any other necessary authorizations from other governmental agencies, or to comply with all other applicable Federal, State, or Local rules and regulations, not addressed in this Permit.

12. PERMIT SHIELD

- A. This facility has a permit shield provided that it operates in compliance with the terms and conditions of this Permit. Compliance with the terms and conditions of this Permit shall be deemed compliance with all applicable requirements specifically identified in Sections 4, 5, 6, and 7, for the emission units as described in the Permittee's application and as identified in this Permit.

Where there is a conflict between the terms and conditions of this Permit and any earlier approval

or Permit, the terms and conditions of this Permit control.

- B. The MassDEP has determined that the Permittee is not currently subject to the requirements listed in Section 4, Table 7.
- C. Nothing in this Permit shall alter or affect the following:
- 1) the liability of the source for any violation of applicable requirements prior to or at the time of Permit issuance.
 - 2) the applicable requirements of the Acid Rain Program, consistent with 42 U.S.C. §7401, §408(a); or
 - 3) the ability of EPA to obtain information under 42 U.S.C. §7401, §114 or §303 of the Act.

13. ENFORCEMENT

The following regulations found at 310 CMR 7.02(8)(h) Table 6 for wood fuel, 7.04(9), 7.05(8), 7.09 (odor), 7.10 (noise), 7.18(1)(b), 7.21, 7.22, 7.70 and any condition(s) designated as "state only" are not federally enforceable because they are not required under the Act or under any of its applicable requirements. These regulations and conditions are not enforceable by the EPA. Citizens may seek equitable or declaratory relief to enforce these regulations and conditions pursuant to Massachusetts General Law Chapter 214, Section 7A

All other terms and conditions contained in this Permit, including any provisions designed to limit a facility's potential to emit, are enforceable by the MassDEP, EPA and citizens as defined under the Act.

A Permittee shall not claim as a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.

14. PERMIT TERM

This Permit shall expire on the date specified on the cover page of this Permit, which shall not be later than the date 5 years after issuance of this Permit.

Permit expiration terminates the Permittee's right to operate the facility's emission units, control equipment or associated equipment covered by this Permit, unless a timely and complete renewal application is submitted at least 6 months before the expiration date.

15. PERMIT RENEWAL

Upon the MassDEP's receipt of a complete and timely application for renewal, this facility may continue to operate subject to final action by the MassDEP on the renewal application.

In the event the MassDEP has not taken final action on the Operating Permit renewal application prior to this Permit's expiration date, this Permit shall remain in effect until the MassDEP takes final action on the renewal application, provided that a timely and complete renewal application has been submitted in

accordance with 310 CMR 7.00: Appendix C(13).

16. REOPENING FOR CAUSE

This Permit may be modified, revoked, reopened, and reissued, or terminated for cause by the MassDEP and/or EPA. The responsible official of the facility may request that the MassDEP terminate the facility's Operating Permit for cause. The MassDEP will reopen and amend this Permit in accordance with the conditions and procedures under 310 CMR 7.00: Appendix C(14).

The filing of a request by the Permittee for an Operating Permit revision, revocation and reissuance, or termination, or a notification of a planned change or anticipated noncompliance does not stay any Operating Permit condition.

17. DUTY TO PROVIDE INFORMATION

Upon the MassDEP's written request, the Permittee shall furnish, within a reasonable time, any information necessary for determining whether cause exists for modifying, revoking and reissuing, or terminating the Permit, or to determine compliance with the Permit. Upon request, the Permittee shall furnish to the MassDEP copies of records that the Permittee is required to retain by this Permit.

18. DUTY TO SUPPLEMENT

The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The Permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after the date a complete renewal application was submitted but prior to release of a draft permit.

The Permittee shall promptly, on discovery, report to the MassDEP a material error or omission in any records, reports, plans, or other documents previously provided to the MassDEP.

19. TRANSFER OF OWNERSHIP OR OPERATION

This Permit is not transferable by the Permittee unless done in accordance with 310 CMR 7.00: Appendix C(8)(a). A change in ownership or operation control is considered an administrative permit amendment if no other change in the Permit is necessary and provided that a written agreement containing a specific date for transfer of Permit responsibility, coverage and liability between current and new Permittee, has been submitted to the MassDEP.

20. PROPERTY RIGHTS

This Permit does not convey any property rights of any sort, or any exclusive privilege.

21. INSPECTION AND ENTRY

Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow authorized representatives of the MassDEP, and EPA to perform the following:

- A. enter upon the Permittee's premises where an operating permit source activity is located or emissions-related activity is conducted, or where records must be kept under the conditions of this Permit;
- B. have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
- C. inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and
- D. Sample or monitor at reasonable times any substances or parameters for the purpose of assuring compliance with the Operating Permit or applicable requirements as per 310 CMR 7.00 Appendix C(3)(g)(12).

22. PERMIT AVAILABILITY

The Permittee shall have available at the facility, at all times, a copy of the materials listed under 310 CMR 7.00: Appendix C(10)(e) and shall provide a copy of the Operating Permit, including any amendments or attachments thereto, upon request by the MassDEP or EPA.

23. SEVERABILITY CLAUSE

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstances, is held invalid, the application of such provision to other circumstances, and the remainder of this Permit, shall not be affected thereby.

24. EMERGENCY CONDITIONS

The Permittee shall be shielded from enforcement action brought for noncompliance with technology based¹ emission limitations specified in this Permit as a result of an emergency². In order to use emergency as an affirmative defense to an action brought for noncompliance, the Permittee shall demonstrate the affirmative defense through properly signed, contemporaneous operating logs, or other relevant evidence that:

¹ Technology based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain health based air quality standards.

² An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation would require immediate corrective action to restore normal operation, and that causes the source to exceed a technology based limitation under the Permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operations, operator error or decision to keep operating despite knowledge of any of these things.

- A. an emergency occurred and that the Permittee can identify the cause(s) of the emergency;
- B. the permitted facility was at the time being properly operated;
- C. during the period of the emergency, the Permittee took all reasonable steps as expeditiously as possible, to minimize levels of emissions that exceeded the emissions standards, or other requirements in this Permit; and
- D. the Permittee submitted notice of the emergency to the MassDEP within two (2) business days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emission, and corrective actions taken.

If an emergency episode requires immediate notification to the Bureau of Waste Site Cleanup/Emergency Response, immediate notification to the appropriate parties should be made as required by law.

25. PERMIT DEVIATION

Deviations are instances where any permit condition is violated and not reported as an emergency pursuant to section 24 of this Permit. Reporting a permit deviation is not an affirmative defense for action brought for noncompliance. Any reporting requirements listed in Table 6. of this Operating Permit shall supersede the following deviation reporting requirements, if applicable.

The Permittee shall report to the MassDEP's Regional Bureau of Waste Prevention the following deviations from permit requirements, by telephone, fax or electronic mail (e-mail) , within three (3) days of discovery of such deviation:

- A. Unpermitted pollutant releases, excess emissions or opacity exceedances measured directly by CEMS/COMS, by EPA reference methods or by other credible evidence, which are ten percent (10%) or more above the emission limit.
- B. Exceedances of parameter limits established by your Operating Permit or other approvals, where the parameter limit is identified by the Permit or approval as surrogate for an emission limit.
- C. Exceedances of Permit operational limitations directly correlated to excess emissions.
- D. Failure to capture valid emissions or opacity monitoring data or to maintain monitoring equipment as required by statutes, regulations, your Operating Permit, or other approvals.
- E. Failure to perform QA/QC measures as required by your Operating Permit or other approvals for instruments that directly monitor compliance.

For all other deviations, three (3) day notification is waived and is satisfied by the documentation required in the subsequent Semi-Annual Monitoring Summary and Certification. Instructions and forms for reporting deviations are found in the MassDEP Bureau of Waste Prevention Air Operating Permit Reporting Kit, which is available to the Permittee via the MassDEP's web site, <http://www.mass.gov/dep/air/approvals/aqforms.htm#op>.

This report shall include the deviation, including those attributable to upset conditions as defined in the

Permit, the probable cause of such deviations, and the corrective actions or preventative measures taken.

Deviations that were reported by telephone, fax or electronic mail (e-mail) within 3 days of discovery, said deviations shall also be submitted in writing via the Operating Permit Deviation Report to the regional Bureau of Waste Prevention within ten (10) days of discovery. For deviations, which do not require 3-day verbal notification, follow-up reporting requirements are satisfied by the documentation required in the aforementioned Semi-Annual Monitoring Summary and Certification.

26. OPERATIONAL FLEXIBILITY

The Permittee is allowed to make changes at the facility consistent with 42 U.S.C. §7401, §502(b)(10) not specifically prohibited by the Permit and in compliance with all applicable requirements provided the Permittee gives the EPA and the MassDEP written notice fifteen days prior to said change; notification is not required for exempt activities listed at 310 CMR 7.00: Appendix C(5)(h) and (i). The notice shall comply with the requirements stated at 310 CMR 7.00: Appendix C(7)(a) and will be appended to the facility's Permit. The permit shield allowed for at 310 CMR 7.00: Appendix C(12) shall not apply to these changes.

27. MODIFICATIONS

- A. Administrative Amendments - The Permittee may make changes at the facility which are considered administrative amendments pursuant to 310 CMR 7.00: Appendix C(8)(a)1., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(b).
- B. Minor Modifications - The Permittee may make changes at the facility which are considered minor modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)2., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(d).
- C. Significant Modifications - The Permittee may make changes at the facility which are considered significant modifications pursuant to 310 CMR 7.00: Appendix C(8)(a)3., provided they comply with the requirements established at 310 CMR 7.00: Appendix C(8)(c).
- D. No permit revision shall be required, under any approved economic incentives program, marketable permits program, emission trading program and other similar programs or processes, for changes that are provided in this Operating Permit. A revision to the Permit is not required for increases in emissions that are authorized by allowances acquired pursuant to the Acid Rain Program under Title IV of the Act, provided that such increases do not require an Operating Permit revision under any other applicable requirement.

28. OZONE DEPLETING SUBSTANCES

This section contains air pollution control requirements that are applicable to this facility, and the United States Environmental Protection Agency enforces these requirements.

- A. The Permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- 1) All containers containing a class I or class II substance that is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR 82.106.
 - 2) The placement of the required warning statement must comply with the requirements of 40 CFR 82.108.
 - 3) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR 82.110.
 - 4) No person may modify, remove or interfere with the required warning statement except as described in 40 CFR 82.112.
- B. The Permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVAC) in Subpart B:
- 1) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices of 40 CFR 82.156.
 - 2) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment of 40 CFR 82.158.
 - 3) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
 - 4) Persons disposing of small appliances, MVACs and MVAC-like appliances (as defined in 40 CFR 82.152) must comply with recordkeeping requirements of 40 CFR 82.166.
 - 5) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair equipment requirements of 40 CFR 82.156.
 - 6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166.
- C. If the Permittee manufactures, transforms, imports or exports a class I or class II substance, the Permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, "Production and Consumption Controls".
- D. If the Permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners". The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo or system used on passenger buses using HCFC-22 refrigerant.

- E. The Permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, "Significant New Alternatives Policy Program".

29. PREVENTION OF ACCIDENTAL RELEASES

This section contains air pollution control requirements that are applicable to this facility, and the United States Environmental Protection Agency enforces these requirements.

Your facility is subject to the requirements of the General Duty Clause, under 112(r)(1) of the CAA Amendments of 1990. This clause specifies that owners or operators of stationary sources producing, processing, handling or storing a chemical in any quantity listed in 40 CFR Part 68 or any other extremely hazardous substance have a general duty to identify hazards associated with these substances and to design, operate and maintain a safe facility, in order to prevent releases and to minimize the consequences of accidental releases which may occur.

APPEAL CONDITIONS FOR OPERATING PERMIT

This Permit is an action of the MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing within 21 days of issuance of this Permit. In addition, any person who participates in any public participation process required by the Federal Clean Air Act, 42 U.S.C. §7401, §502(b)(6) or under 310 CMR 7.00: Appendix C(6), with respect to the MassDEP's final action on operating permits governing air emissions, and who has standing to sue with respect to the matter pursuant to federal constitutional law, may initiate an adjudicatory hearing pursuant to Chapter 30A, and may obtain judicial review, pursuant to Chapter 30A, of a final decision therein.

If an adjudicatory hearing is requested, the facility must continue to comply with all existing federal and state applicable requirements to which the facility is currently subject, until a final decision is issued in the case or the appeal is withdrawn. During this period, the application shield shall remain in effect, and the facility shall not be in violation of the Act for operating without a Permit.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts which are the grounds for the request, and the relief sought. Additionally, the request must state why the Permit is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to The Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

The Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

The request will be dismissed if the filing fee is not paid unless the appellant is exempt or granted a waiver as described below.

The filing fee is not required if the appellant is a city or town (or municipal agency) county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

The MassDEP may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.